



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

FEB 07 2011

Ref: EPR-N

Mr. James Christian
Division Administrator
Federal Highway Administration
2520 West 4700 South
Suite 9A
Salt Lake City, UT 84119

Re: Tooele County Midvalley Highway Final
Environmental Impact Statement: CEQ #20110003

Dear Mr. Christian:

In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the United States Environmental Protection Agency (EPA) Region 8 has reviewed the Final Environmental Impact Statement (FEIS) for the Tooele County Midvalley Highway project located in eastern Tooele County, Utah.

The joint lead agencies have identified the Preferred Alternative as the Midvalley Highway West Alternative with Option B. This alternative includes the following elements:

- A four-lane arterial between SR-36 and SR-112
- A four-lane freeway between SR-112 and I-80
- A realignment of SR-138 at Sheep Lane
- Interchanges with the proposed freeway at I-80, SR-138, and 1000 North, as well as the planned 3400 North (future parkway)
- Structures over the UPRR tracks, Erda Way, Sheep Lane, the Midvalley Trail, and at-grade intersections with SR-112 and SR-36

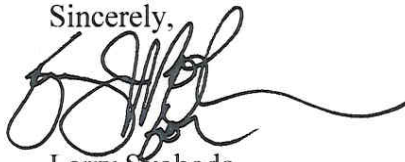
EPA finds that responses to comments on the DEIS in our letter dated October 20, 2009 have been adequately addressed in the FEIS. Additionally, we express our appreciation at the inclusion of Appendix A – Air Quality and the recommended construction air quality mitigation measures. However, we would like to point out that since the date of our comment letter on the DEIS the following updates would have been beneficial to include in the FEIS with respect to full public disclosure:

1. EPA promulgated a 1-hour 100 parts per billion national ambient air quality standard for nitrogen dioxide. This information could have been included in Table A-1 in Appendix A, and can be found at <http://www.epa.gov/air/criteria.html>.
2. Ambient air quality data for 2009 would have been available from the State of Utah shortly after May 1, 2010, and could have been included in Table A-2 in Appendix A.

In addition, the FEIS stated (p. 11) that EPA's Motor Vehicle Emissions Simulator (MOVES2010) model was not used for this project. The limitations of EPA's MOBILE6.2 model were clearly described in the FEIS, however, there was little discussion about EPA's MOVES2010 model (announced and officially released on March 2, 2010), the MOVES2010a update (released in August, 2010), and the official announcement and approval of MOVES2010a for the use in CO, PM2.5, and PM10 quantitative hot-spot analyses (December 20, 2010). We note that, while the MOVES model was not required to be used for this project because of the allowed 2-year grace period for the continued use of MOBILE6.2, a brief discussion of the MOVES model and its benefits for future modeling could have been included in the FEIS. MOVES2010 is a significant improvement over MOBILE6.2 for estimating criteria pollutants, mobile source air toxics (MSAT), and greenhouse gas emissions from the transportation sector. It is EPA's approved motor vehicle emission factor model for estimating volatile organic compounds, nitrogen oxides, carbon monoxide, and direct particulate matter (PM2.5 and PM10). It is also EPA's best available tool for quantification of emissions of MSATs which include the following of primary concern: benzene, 1,3-butadiene, formaldehyde, acrolein, naphthalene, polycyclic organic matter, and diesel particulate.

Thank you for the opportunity to participate in the review of the Tooele County Midvalley Highway project. If you have any questions about our comments, feel free to either contact me at (303) 312-6004 or David Fronczak of my staff at (303) 312-6096.

Sincerely,



Larry Svoboda
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

